

June 07, 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASUnited States District Court
Western District of Texas
El Paso DivisionBY: Fidel Morales
DEPUTYUnited States of America,
Plaintiff,

v.

Yohangel Javier MARTINEZ-Gonzalez,
Defendant.**EP:24-M-02316-MAT****United States' Motion to Detain Defendant Without
Bond and Motion for Continuance**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant was arrested for a violation of Title 8, United States Code, Section 1324, *Alien Smuggling*. This charge is a deportable offense under immigration law.
2. The Defendant is a foreign national and cannot demonstrate sufficient employment, length of residence in the community, or community ties, and, as such, presents a high risk of fleeing the jurisdiction to avoid prosecution on this charge.
3. The Defendant has a prior criminal history.
4. There are no conditions or combination of conditions which will reasonably assure the safety of the community should the Defendant be released on bond.
5. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three-day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

JAIME ESPARZA
UNITED STATES ATTORNEY

By: Mathew Engelbaum
MATHEW ENGELBAUM
Assistant U.S. Attorney
Texas Bar #24097653
700 E. San Antonio, Suite 200
El Paso, Texas 79901
(915) 534-6884